

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X

UNITED STATES OF AMERICA

18-CR-134 (S-2) (KAM)

-against-

Donville Inniss, *et al.*,

Defendants.

-----X

NOTICE OF MOTION
FOR PRO HAC VICE ADMISSION
OF RONALD G. DEWAARD

NOTICE OF MOTION

TO: COUNSEL OF RECORD

PLEASE TAKE NOTICE that upon the annexed Affidavit of Ronald G. DeWaard (**Exhibit A**) in support of this motion and the Certificate(s) of Good Standing (**Exhibit B**) annexed thereto, I John J. Rolecki, move this Court pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York for an order to admit Ronald G. DeWaard, a partner of the firm of Varnum LLP and a member in good standing of the bar of the State of Michigan, as counsel and advocate *pro hac* vice in the above-captioned case for Defendant Ingrid Innes, for the purpose of responding to the United States' Motion (ECF No. 54) regarding whether a document created by Ingrid Innes, for her counsel, is protected by the attorney-client privilege. There are no pending disciplinary proceedings against me in any state or federal court.

Respectfully submitted,

Dated: September 3, 2019

/s/ John J. Rolecki

John J. Rolecki
Varnum LLP
333 Bridge Street
Grand Rapids, MI 49504
jjrolecki@varnumlaw.com
Phone: 616-336-6000

15331125